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January 9, 2025

VIA ECF

Honorable Gregory H. Woods
 United States District Judge
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

USDC SDNY
 DOCUMENT
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 DATE FILED: 1/9/2025

MEMORANDUM ENDORSED

RE: *Emilio Garcia v. Roc Nation LLC, et al.*
S.D.N.Y. Case No. 24-cv-07587 (GHW)

Dear Judge Woods:

We are co-counsel for Plaintiff in the above-referenced matter. We write jointly with Defendants' counsel as a follow up to the December 23, 2024 pre-motion conference held before your Honor regarding Plaintiff's anticipated motion for leave to amend the Complaint.

Counsel for all Parties have met and conferred on the issues discussed at the conference. To avoid unnecessary motion practice, the Parties agreed Plaintiff may file the proposed First Amended Complaint (the "FAC") (a copy of which attached as **Exhibit A**). Defendants have advised that they consent to the filing of the amended complaint without waiver of any arguments they may choose to put forth in favor of dismissal, and the parties reserve all other rights with respect to the amendment of the complaint.

As such, pursuant to Your Honor's Individual Part Rules and Federal R. Civ. Procedure 15(a)(2), we respectfully request leave to file the attached revised FAC.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

VALIANT LAW

s/ Joseph Jeziorkowski
 JOSEPH JEZIORKOWSKI
 DANIEL FOLCHETTI
 WILLIAM KNIGHT

Re: *Garcia v. Roc Nation, LLC, et al.*

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WEST COAST TRIAL LAWYERS, APLC

s/ Ronald Zambrano

RONALD L. ZAMBRANO (*pro hac vice*)

cc: All Counsel of record via ECF

Application granted. Plaintiff's application to file the proposed First Amended Complaint, a copy of which is filed at Dkt. No. 86-1, is granted. Pursuant to Fed. R. Civ. P. 15(a)(3), the deadline for Defendants to answer or otherwise respond to the First Amended Complaint is 14 days after the date of service of the amended complaint. Any pre-motion letter should comply with the Court's Individual Rules of Practice in Civil Cases.

SO ORDERED.

Dated: January 9, 2025
New York, New York


GREGORY H. WOODS
United States District Judge